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February 8, 2002

OFFICE OF THE
EXECUTIVE SECRETARY

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Docket No. 97-00409: All Telephone Companies Tariff Filings
Regarding Reclassification of Pay Telephone Service
UTSE Response to TPOA Discovery- Fourth Set

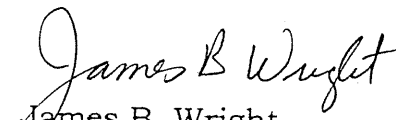
Dear Mr. Waddell:

Enclosed for filing are an original and thirteen copies of United Telephone-Southeast, Inc.'s Response to the Fourth Set of Data Requests from the Tennessee Payphone Owners Association. Documents in response to Data Request No. 1 continue to be compiled and are expected to be completed by the end of next week. The documents will be provided promptly upon completion. A response to Data Request No. 5b will be provided at the same time as the documents in response to Item No. 1.

A copy of the Response is being served on counsel of record. Please note that certain of the information has been designated proprietary and as such is subject to the Protective Order entered in this Case.

Please contact me if you have any questions.

Sincerely,


James B. Wright

cc: Counsel of Record (with enclosure)
Laura Sykora
Kaye Odum
Whitney Malone

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Tariffs regarding Reclassification of Pay Telephone Service)

The undersigned hereby certifies that a copy of United's Response to Fourth Set of Data Requests was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

Henry Walker
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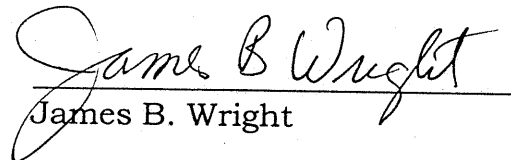
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February 8, 2002


James B. Wright

UNITED TELEPHONE-SOUTHEAST, INC. RESPONSE TO
TENNESSEE PAYPHONE OWNERS ASSOCIATION
FOURTH SET OF DATA REQUESTS DATED 1/25/02
DOCKET NO. 97-00409

1. Refer to file *TN PP 10-01 Inputs_4b.xls*. Provide complete supporting documentation for the values in the *TN PP 10-01 Inputs_4b.xls* file, and explain why Sprint chose to change these input values for the October 10, 2001 study.

RESPONSE:

Documents responsive to No. 1 are quite voluminous. (See proposed list of attachments and description of documents in matrix below) Compilation is not expected to be complete until February 15, 2002.

Attachment	Description
Material_XXXX (in separate folder)	XXXX denotes the equipment for which the file provides support. These files are a series of quotes from Sprint North Supply and are the base cost to Sprint for material.
Sprint North Supply Fees - Jul 2001_Q1.xls	Development of loading applied to material to account for Sprint North Supply fees. The factor accounts for charges that Sprint North Supply adds to the material to account for customer service, overhead, return on assets, and return on inventory investments.
Product Costs - Sept 2001_TNPP_Q1.xls.	Product costs specific to Tennessee. The result of the files are the material costs from the Sprint North Supply Quotes with the Sprint North Supply loading factor specific to Tennessee. The material cost results are entered into workpapers, which add labor, tax and power (if applicable) to develop inputs for the Sprint Loop Cost Model.
TNPACS_Q1.xls	Work order analysis for support of engineering, placing, splicing, overheads, and exempt material related to fiber and copper cable. Analyzes work orders closed in 1998-2000. Summaries are completed for each year studied. Results are summarized to a per foot input into Workpaper 1.
LLR Rate Summary_TN_Q1.xls	Development of loaded labor rates applied to SAI, DLC, and aerial drop inputs.
Common and Power Study_Q1.xls	Development of factor added to central office DLC equipment to account for central office backup power. Input into DLC workpapers.

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Response to Question 1 (continued)

As provided in Data Request Response 2b from the TPOA's 2nd Set of Data Requests to Sprint, "Sprint made the changes to be responsive to the TPOA's request for payphone specific loop information and to provide the Tennessee Regulatory Authority the best information possible for its decision in this docket." Sprint made the changes so the inputs would reflect the most current information available on material and labor costs.

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2. Refer to the electronic copy of October 10, 2001 Payphone Cost Study, file TN Payphone 10_10_01/Payphone Study geocode_USF ROR/8 INPTNUSF.xls, tab "loop", rows 57-80.

Provide the following information:

- a. For each wire center in column E, provide a listing of the grids that are mapped to that wire center.
- b. For each grid identified in part a., provide the total number of 2-wire voice grade lines in that grid (consistent with the information presented in column J).
- c. For each grid identified in part a., provide the total C&WF Investment for that grid (consistent with the information presented in column K).
- d. For each grid identified in part a., provide the total Circuit Investment for that grid (consistent with the information presented in column L).
- e. For each grid identified in part a., provide the total number of Payphone Lines in that grid (consistent with the information presented in column F).

RESPONSE:

Please see Proprietary attachment "TN PP Grid Results Q2_Q3.xls."

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3. Refer to the March 6, 2001 Payphone Cost Study, page 35 (entitled "Loop Monthly Cost (TELRIC)"). Provide the following information:
- a. For each wire center in Wire Center column, provide a listing of the grids that are mapped to that wire center.
 - b. For each grid identified in part a., provide the total C&WF Investment for that grid (consistent with the information presented in the column entitled "C&WF Investment").
 - c. For each grid identified in part a., provide the total Circuit Investment for that grid (consistent with the information presented in the column entitled "Circuit Investment").

RESPONSE:

Please see Proprietary attachment "TN PP Grid Results Q2_Q3.xls."

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4. Refer to the file TN Payphone 10_10_01/TN Payphone Oct 2001 comparisons/TN Avg Loop Length. Explain in detail how the values in the columns Avg Payphone Loop Length (column B) and Avg Loop Length (column C) were developed.

a. Based on this methodology, will each loop assigned to a given grid have the same reported length? Explain in detail why this would or would not be the case.

RESPONSE:

Yes. For the cost study, each loop assigned to a given grid will have the same reported loop length. The methodology for calculating the loop lengths of each wire center was also provided in response to Data Request Set 3, Question 1a. Based on the methodology, each loop assigned to a given grid will have the same reported loop length for investment calculations. The average loop length is based on the feeder, sub-feeder, sub-feeder part 2, average DLC to SAI feeder, and distribution lengths. For each grid, SLCM divides each grid into four quadrants. Within each quadrant, the geographic road centroid is used as the location of the serving area interface (SAI). The distribution branch and backbone cables are then built from the SAI. Therefore each quadrant will have different distribution lengths. Each grid will have the same feeder, sub-feeder and sub-feeder part 2 lengths. However, for the purpose of calculating average loop length provided in the above file, the grid average loop length was used. The grid average used on the file accounts for the different lengths between quadrants. Therefore, each grid average appropriately accounts for the varying lengths of loops in a grid. The loop length calculations were made after the investment calculations were completed. Therefore any changes to loop length will not have an impact on investment.

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5. Refer to the electronic copy of the October 10, 2001 Payphone Cost Study, file TN Payphone 10_10_01/Payphone Study geocode_USF ROR/8 INPTNUSF.xls, tab "loop", rows 57-80.

- a. Please identify any differences in the network facilities and equipment used to develop the C&WF Investment for Payphone Lines versus other 2-wire analog lines. If any payphone-specific facilities or equipment are included, please identify this payphone-specific equipment (including manufacturer and model number), identify its location in file *TN PP 10-01 Inputs_4b.xls*, and describe in detail the function of this equipment.
- b. Please identify any differences in the network facilities and equipment used to develop the Circuit Investment for Payphone Lines versus other 2-wire analog lines. If any payphone-specific facilities or equipment are included, please identify this payphone-specific equipment (including manufacturer and model number), identify its location in file *TN PP 10-01 Inputs_4b.xls*, and describe in detail the function of this equipment.

RESPONSE

5a. There are no differences between the network facilities and equipment used to develop the C&WF Investment for Payphone Lines versus other 2-wire analog lines. The payphone costs account for only those grids that contain payphones.

5b. Response to 5b will be provided with the Response to Question 1.